

From: [St. John, Joseph](#)
To: [Greb, Emily J. \(MSN\)](#); [Dryden, Kaitlin \(MSN\)](#); [Cruz, Nancy \(MSN\)](#)
Cc: [James Percival](#)
Subject: RE: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.)
Date: Wednesday, March 8, 2023 11:13:49 AM
Attachments: [image001.png](#)

Emily:

We agree vis-à-vis service on February 27, and that the date for compliance will be March 17. If you have other issues that can be resolved informally, please let me know as soon as possible.

Best regards,
Scott

From: Greb, Emily J. (MSN) <EGreb@perkinscoie.com>
Sent: Wednesday, March 8, 2023 11:04 AM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>; Dryden, Kaitlin (MSN) <KDryden@perkinscoie.com>; Cruz, Nancy (MSN) <NancyCruz@perkinscoie.com>
Cc: James Percival <James.Percival@myfloridalegal.com>
Subject: RE: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.)

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Scott,

I am writing to follow up on my below email. We would appreciate your prompt confirmation that we have reached the agreement outlined below. If not, I think we should touch base with a phone call this afternoon. Please provide the confirmation requested below, or times you are available to discuss later today.

Best Regards,
Emily

Emily Greb | Perkins Coie LLP

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E. EGreb@perkinscoie.com

From: Greb, Emily J. (MSN)
Sent: Tuesday, March 7, 2023 3:00 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>; Dryden, Kaitlin (MSN) <KDryden@perkinscoie.com>; Cruz, Nancy (MSN) <NancyCruz@perkinscoie.com>
Cc: James Percival <James.Percival@myfloridalegal.com>
Subject: RE: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.)

Scott,

Thanks for the response. While we do not agree with your analysis of service of the subpoena, in order to reach a resolution on the operative deadlines, we are willing to agree in this case that we have accepted service as of February 27th on the understanding that the date for compliance will be March 17th, and that, as in my initial email, we have reserved all our rights to object and/or move to quash, as provided by the Federal Rules of Civil Procedure and any relevant Local Rules.

Please confirm we are in agreement.

Regards,
Emily

Emily Greb | Perkins Coie LLP

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E. EGreb@perkinscoie.com

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>

Sent: Monday, March 6, 2023 1:50 PM

To: Greb, Emily J. (MSN) <EGreb@perkinscoie.com>; Dryden, Kaitlin (MSN) <KDryden@perkinscoie.com>; Cruz, Nancy (MSN) <NancyCruz@perkinscoie.com>

Cc: James Percival <James.Percival@myfloridalegal.com>

Subject: RE: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.)

Emily:

Your email needlessly puts us off on a rocky start.

Innovation Law Lab (“ILL”) – through its executive director and its registered agent – has had actual notice of our subpoena since at least February 24 via an email to Ms. Koch and Mr. Manning that attached the subpoena, as well as an attempt to serve ILL’s President that same day. With respect to service, I am informed that Ms. Koch, as registered agent, failed to present for service at ILL’s registered address on February 27; the office manager could not provide a time or date when Ms. Koch would be in; and the office manager would not say if Ms. Koch had a set schedule. The office manager did, however, confirm the location was an address for ILL and that she could accept service. Accordingly, personal service was effected on ILL as of February 27. *See, e.g.*, Or. R. Civ. P. 7(D)(3)(b) (i). As a courtesy, I then sent confirmatory emails attaching the subpoena to Ms. Koch and Mr. Manning on February 28. Our request for confirmation was to avoid any needless dispute before a federal district court. We renew that request now.

With respect to timing, we believe the subpoena provides a reasonable time for compliance. As a courtesy, we will extend the deadline to March 17, 2023, at 10:00 a.m. If you believe the place of compliance is inconvenient, we are willing to work with ILL, and we are happy to accept production electronically. We are also willing to work with you to minimize any burden. Again, we would like to avoid troubling a federal court with procedural disputes that can be resolved informally.

Best regards,
Scott



Joseph Scott St. John

Deputy Solicitor General
Office of Attorney General Jeff Landry
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www.AGJeffLandry.com

From: Greb, Emily J. (MSN) <EGreb@perkinscoie.com>
Sent: Saturday, March 4, 2023 1:46 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>; Dryden, Kaitlin (MSN) <KDryden@perkinscoie.com>; Cruz, Nancy (MSN) <NancyCruz@perkinscoie.com>
Cc: James Percival <James.Percival@myfloridalegal.com>
Subject: RE: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.)

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Scott,

Thanks for the email. We are willing to accept service of a subpoena with an updated date for compliance, while preserving all our rights to object and/or move to quash. As you suggest in your email regarding burden, the current date for compliance is unreasonable. If you agree to email a modified subpoena with an April 10th date for compliance, and drop the subpoena attached to your below email, we will accept service of the modified subpoena on behalf of Innovation Law Lab. However, in agreeing to accept email service of the modified subpoena we reserve all our rights to object and/or move to quash, as provided by the Federal Rules of Civil Procedure and any relevant Local Rules. Please let me know if you agree.

Best,

Emily

Emily Greb | Perkins Coie LLP

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From: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Sent: Friday, March 3, 2023 10:54 AM
To: Dryden, Kaitlin (MSN) <KDryden@perkinscoie.com>; Greb, Emily J. (MSN) <EGreb@perkinscoie.com>; Cruz, Nancy (MSN) <NancyCruz@perkinscoie.com>

Cc: James Percival <James.Percival@myfloridalegal.com>

Subject: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.)

Counsel:

We look forward to working with you on Innovation Law Lab's subpoena response. In particular, we are happy to discuss the timing of Innovation Law Lab's response and work with you to minimize any burden.

Given the circumstances of service and consistent with Innovation Law Lab's duty to minimize costs, please confirm that Innovation Law Lab has been served or, alternatively, that you will accept service on Innovation Law Lab's behalf.

Best regards,
Scott



Joseph Scott St. John

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From: Stephen Manning <stephen@innovationlawlab.org>

Sent: Friday, March 3, 2023 10:25 AM

To: St. John, Joseph <StJohnJ@ag.louisiana.gov>

Cc: Dryden, Kaitlin (MSN) <KDryden@perkinscoie.com>; Greb, Emily J. (MSN) <EGreb@perkinscoie.com>; Cruz, Nancy (MSN) <NancyCruz@perkinscoie.com>

Subject:

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Greetings,

In relation to "Subpoena to produce documents, information, or objects or to permit inspection of premises in a civil action" in the matter of *Arizona v. Garland*, 6:22-cv-1130, please direct all communications to our counsel, Emily Greb, Nancy Cruz, and Kaitlin Dryden, cc'd here.

--

Stephen W Manning | Executive Director

p: 503-241-0035

a: PO Box 8382, Portland, OR 97207

w: <https://innovationlawlab.org>

pronouns: he/him

stephen@innovationlawlab.org

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